

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

01/19/05 PM 2:27

DARLINGTON AMADASU
Plaintiff

Case No: 1- 01-cv- 210

Black/Dlott

-V-

JAMES R. DONOVAN, MD, et al
Defendants

**PLAINTIFF'S NOTICE OF
EXTRA-JUDICIAL CONFERENCE TO RESOLVE
DEFENDANTS' INSUFFICIENT, EVASIVE, INCOMPLETE
OR NON-RESPONSES TO HIS DISCOVERY REQUESTS**

Subsequent or sequel to the unsuccessful plaintiff's initiated telephonic conference with Ohio and Texas defendants on 01/14/05 to resolve defendants' insufficient, evasive, incomplete and or non-responses to the mandatory automatic Rule 26(a)(1)(B) initial disclosures requirements, and his Rules 33, 34, and 36 discovery requests to the defendants, plaintiff and Ohio defendants' counsel, Mr Justin D. Flamm agreed to hold conference hopefully to resolve extrajudicially plaintiff's concerns about the said defendants' inadequate responses.

Plaintiff left messages and invitation with subordinates of Texas defendants' counsel, Mr Ramiro Canales to attend the conference either in person or by phone on the below scheduled date, place and time.

PLEASE TAKE NOTICE that all parties conference shall hold at the offices of Mr. Flamm, Taft, Stettinius & Hollister LLP, at 425 Walnut Street, Suite 1800, Cincinnati, Ohio 45202 on **FRIDAY, JANUARY 21, 2005 at 10:00 am:**

Plaintiff, Darlington Amadasu, will inspect and obtain copies of the below documents from both Ohio and Texas defendants as follows:

1. Every, any, and all categories of documents, i.e., (i) to (viii) documents, in the office, possession, custody, or control of Ohio defendants' counsel, Mr Justin D. Flamm, and which Ohio defendants described, under Rule 26(a)(1)(B), in the Ohio Defendants' Supplemental Rule 26(a)(1) Disclosures
2. Every, any, and all categories of documents in the office, possession, custody, or control of Ohio defendants' counsel, Mr Justin D. Flamm, and which Ohio defendants described, under Rule 26(a)(1)(D), in the Ohio Defendants' Supplemental Rule 26(a)(1) Disclosures
3. Every, any, and all categories of documents in the possession, custody, or control of Texas defendants' counsel, Mr Ramiro Canales, and which Texas defendants described, under Rule 26(a)(1)(B) in the Texas Defendants' Rule 26(a)(1) Initial Disclosures
4. Every, any and all categories of documents that plaintiff had requested in his Rule 34 Requests for Production of Documents and things from all the defendants.

5. Every, any and all categories of documents that Ohio and Texas defendants identified and promised to produce for inspection and copying in their responses to plaintiff's Rule 34 Requests for Production of Documents and things from all the defendants.
6. Every, any and all categories of documents that defendants had identified and partly responsive to plaintiff's Rule 33 Interrogatories to defendants.
7. The insufficiencies, evasiveness, incompleteness in defendants' responses and non-responsiveness or failures of defendants to answer plaintiff's Rule 33, 34 and 36 discovery requests upon the defendants will be deliberated and attempted at resolving.

PLEASE TAKE NOTICE THAT: (a) The Ohio defendants shall identify each document specifically and separately in alphabetical order, that is, **Ohio Dft. "A"...."Z"**, (b) The Texas defendants shall identify each document specifically and separately in alphabetical order, that is, **Texas Dft. "A"...."Z"**. Defendants should produce the documents and things as mandated by Rule 34(b) with documentation of compliance.

It is the duty, obligation and responsibility of defendants' counsels to obtain documents and things from their clients for production to plaintiff.

Texas defendants' counsel, Mr Ramiro Canales should express-mail their documents to care of Mr Justin Flamm, the Ohio defendants' counsel to enable plaintiff inspect and copy them or in the alternative mail copies of your documents to plaintiff at his Ohio address.

Respectfully submitted

/s/Darlington Amadasu

Darlington Amadasu,
Plaintiff.

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was served on
Justin D. Flamm and Ramiro Canales by faxes on 01/15/05

/s/Darlington Amadasu